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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

OCT 19 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
800 Data Base Access Tariffs and the	)	DA 93-930
800 Service Management System Tariff	)	CC Docket No. 93-129

**REPLY OF THE PARTICIPATING BELL OPERATING COMPANIES  
IN SUPPORT OF THEIR PETITION FOR WAIVER REGARDING  
THE COMMON CHANNEL SIGNALLING COST INFORMATION SYSTEM**

The objections to the participating Bell Operating Companies' Petition for Waiver fall short of the mark. The intervenors have not shown and cannot show (i) why the Common Channel Signalling Cost Information System ("CCSCIS") model is anything other than a trade secret entitled to confidential treatment pursuant to the Commission's rules; (ii) why use of CCSCIS is not essential to the scientific allocation of joint and common costs that is far more accurate than the available alternatives; (iii) why access to the algorithms and vendor inputs to CCSCIS is essential to meaningful review and analysis of the LECs' 800 database tariff rates; or (iv) why the Commission's parallel decision in the ONA proceeding is not dispositive of the confidentiality issues presented here. Accordingly, the Petition for Waiver should be granted.

**Summary**

The opponents of the Petition for Waiver provide no reason why the Commission should deviate from its previous decision concerning the confidential treatment of cost study models which

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incorporate proprietary vendor information.<sup>1</sup> There is, in fact, no reason why the procedures for limited, confidential access to such models adopted by the Commission in the past are not equally appropriate here. (See pp. 3-6 below.) Likewise, the intervenors who oppose the Petition for Waiver appear to assume that all LECs could support their cost analyses without benefit of CCSCIS or similar models. This ignores important differences in the manner in which each LEC can most effectively analyze and support its costs for the Commission. (See pp. 6-10 below.) In essence, the intervenors want to have it both ways: they want the freedom to criticize any LEC cost submission to the Commission as inadequately justified, while at the same time trying to deny the LECs the use of best available methods for supporting those costs. That is not a result that the Commission should allow.

**I. The Intervenors' Objections to Bellcore's Proposed Method of Access to CCSCIS Are Groundless.**

CCSCIS has been used by nearly all the LECs in this proceeding to support their cost analyses because the model permits a rigorous, engineering-based examination of each function performed by a specific vertical 800 database feature.<sup>2</sup> In that respect, CCSCIS represents a dramatic advance over past, manual methods of

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<sup>1</sup> See Commission Requirements for Cost Support Material to be Filed with Open Network Architecture Access Tariffs, 7 FCC Rcd 1526 (1992). The Commission's approach was affirmed in Allnet Communications Serv. v. FCC, 800 F. Supp. 894 (D.D.C. 1992).

<sup>2</sup> See Comments of Cincinnati Bell Tel. Co. at 2 ("CBT is not aware of any other process for developing the investments associated with its 800 data base service that would not use the CCSCIS model.").

cost analysis, and one which enables the Commission to obtain precise and accurate joint-cost allocations. See Britt Affidavit ¶¶ 4-5.

The model is such a powerful tool in cost analysis precisely because it is based upon confidential business information from equipment vendors. The vendors have made it clear that they will not continue to participate in CCSCIS if their confidential information is disclosed: as one vendor has advised the Commission, publication of its inputs would give its competitors "detailed, nonpublic price and technical information concerning [our] current and planned products," and "would clearly cause irreparable harm."<sup>3</sup> CCSCIS will therefore continue to be a valuable method for complex cost analysis only if it and the equipment vendor inputs upon which it is based remain confidential.

Given those basic facts about the contents of the model, which no intervenor has seriously contested, Bellcore has proposed a method for intervenor access to the model that seeks to balance the intervenors' interests and the competing public interest in the continuing use of CCSCIS in a workable manner.<sup>4</sup> Nevertheless,

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<sup>3</sup> See Comments of Northern Telecom on the Petitions for Waiver (filed Oct. 12, 1993) at 2-4 (supporting Petition for Waiver because publication of CCSCIS "would be likely to place Northern Telecom at a severe competitive disadvantage"); see also Petition for Waiver, attachments 3-5 (comments of other equipment vendors).

<sup>4</sup> The intervenors appear to presume, without any basis, that the "public interest" as they see it always requires the disclosure of confidential business information in tariff investigations. The public, however, is also interested in reasonable rates based on the most accurate up-to-date methods. Some intervenors even appear to claim that the LECs are never entitled to rely upon confidential  
(continued...)

several petitioners contend that anything less than full disclosure, albeit with a protective order, is inadequate.<sup>5</sup> National Data asserts that anything less than full publication of the models will preclude informed public participation<sup>6</sup> and that the LECs are not entitled to withhold any of their cost information or analysis from disclosure.<sup>7</sup> Those nonspecific objections to Bellcore's proposal should be rejected.

1. Bellcore's proposal would provide the Commission with full access to the model, and would give intervenors access to the methodologies employed by CCSCIS as well as its input and operational variables. See Petition for Waiver at 9-11. The information that Bellcore cannot release without jeopardizing the

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<sup>4</sup> (...continued)  
information to support tariffs, analogizing the matter to waiver of a privilege. See Opposition of National Data Corp. at 5 n.11 (citing 1951 California Supreme Court decision). The case they cite, which deals primarily with issues of privilege, has no bearing on this case. Even if privilege issues were relevant, the case would be inapposite because it did not involve a properly-founded claim of privilege, and did not involve an attempt to claim the privilege by the person to whom it belonged. See City & County of San Francisco v. Sup'r Ct., 231 P.2d 26, 29 (Cal. 1951). Here, the parties interested in confidentiality -- the vendors and Bellcore -- have both objected to disclosure. Moreover, intervenors' rule proves too much: even in cases where a privilege is waived for some purposes, parties are entitled to protect confidential information from publication, which is why courts routinely enter protective orders and provide for in camera procedures that are functionally identical to what Bellcore has proposed here -- and is consistent with the approach taken by the Commission in the ONA proceeding.

<sup>5</sup> See Comments of National Data at 6-7; Comments of Ad Hoc Committee at 7-8; Comments of Allnet at 3-4.

<sup>6</sup> Comments of National Data at 5.

<sup>7</sup> Comments of National Data at n.11.

value of CCSCIS and the confidentiality of the equipment vendors' inputs will be verified for accuracy by those who provided it to Bellcore (i.e., the vendors), or has already been verified by Arthur Andersen & Co. in the ONA proceeding and been found to be reasonable.<sup>8</sup> All the information that would be withheld from the intervenors therefore has either been reviewed or will be reviewed and verified by parties with no stake in the LECs' cases.

2. The intervenors will therefore be provided access to virtually all the information developed by the LECs. The intervenors' access to that information will allow them to review the elements of the cost studies that are most likely to affect rate disparity, as was determined in the ONA proceeding. See Petition for Waiver at 10-11. Accordingly, no intervenor can demonstrate substantial prejudice as a result of a decision granting this waiver.

3. Equally important, the intervenors' "publish-or-else" demand rests on the faulty premise that the Commission's task in this proceeding requires the submission on the open record of every bit of data and piece of paper used to develop cost projections. As a matter of law, section 61.38 requires the LECs to submit their work papers and studies to support their rates, but it does not require publication of the CCSCIS vendor inputs to the intervenors or the expropriation of Bellcore's model. The supporting data required by the Commission's Rules in regulated-

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<sup>8</sup> The CCSCIS algorithms are for the most part based on the SCIS processes evaluated by Arthur Andersen in the ONA proceeding.

service investigations are "first and foremost a tool to assist [the Commission] in evaluating the usefulness of tariff filings."<sup>9</sup> The Part 61 requirements are "mere aides to the exercise of the agency's independent discretion" and were not "intended to confer important procedural benefits upon individuals".<sup>10</sup> The underlying data that will be made available clearly satisfy the test of reasonable and substantial compliance, which is all that the Commission has previously required of carriers for regulated services.<sup>11</sup>

**II. The Intervenor's Opposing the Waiver Request Undervalue the Role of CCSCIS in the LEC's Basic and Vertical Cost Analyses.**

Implicitly recognizing that they cannot compel the open-record production of CCSCIS and its confidential vendor inputs, the intervenors attempt to obscure the role of CCSCIS in the LECs' filings in order to suggest that all the LECs should be forced to calculate their costs without relying on CCSCIS. As explained below, the intervenors' broad-brushed argument assumes that if some LECs could support some costs without use of CCSCIS, no LEC should

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<sup>9</sup> ITT World Communications, 74 F.C.C.2d 709, 716 (1979).

<sup>10</sup> Associated Press v. FCC at 1104 (quoting American Farm Lines v. Black Ball Freight Service, 397 U.S. 532, 538-39 (1970)).

<sup>11</sup> IBM v. FCC, 570 F.2d 452, 456 (2d Cir. 1978). In Papago Tribal Utility Authority, the court observed that filing regulations similar to Part 61 of the Commission's Rules "employs a flexible standard of substantial compliance", 628 F.2d at 241-241. See also ARINC v. FCC, 642 F.2d 1221 (D.C. Cir. 1980), cert. denied, 451 U.S. 976 (1981).

be allowed to use CCSCIS for any purpose. The Commission cannot accept such flawed logic.

**A. Vertical-Feature Costs.**

This proceeding involves both vertical and basic features of the 800 database service. As demonstrated in the Petition for Waiver, its supporting Exhibits and the Britt Affidavit, a reliable alternative to the use of CCSCIS or a similar model or process is not available for calculating the costs of 800 database vertical features for any LEC that included capital-related costs in its filing. That is true because each vertical feature can only be differentiated from another vertical feature (and from basic 800 database service) on the basis of record storage and the processing time required by the Service Control Point (SCP) to complete the specific transaction called for by the vertical feature. (See Petition for Waiver at 2-3.) Because the operating characteristics of each SCP are different, the use of CCSCIS or a similar model is critical to demonstrating the cost basis for vertical-feature rates.

Nevertheless, intervenor MCI contends that the LECs have failed to demonstrate good cause for a waiver of publication, with respect to either basic or vertical services, because the LECs can uniformly provide "some other justification for rates" that does not depend upon CCSCIS. (MCI Comments at 1-4.) MCI does not try to explain how the LECs who relied upon CCSCIS should try to support vertical-feature rates without using CCSCIS. MCI and its allies would undoubtedly criticize any other type of vertical cost

demonstration as inadequate. In that respect, the denial of the petition for waiver would deprive the LECs of the ability to develop cost-based vertical-feature rates that can be demonstrated to be just and reasonable.

**B. Basic-Feature Costs.**

With respect to basic-feature costs, the Ad Hoc Telecommunications Users Committee (the "Ad Hoc Committee") and National Data Corporation contend that because some LECs have not relied upon CCSCIS to develop exogenous costs for 800 database basic service, all LECs should be deprived of the use of CCSCIS unless it is published on the open record. The confidentiality agreements and commitments with the equipment vendors mean that the LECs cannot use CCSCIS in a context that would require publication. The position taken by the Ad Hoc Committee and National Data is thus tantamount to a requirement that the LECs who have relied upon CCSCIS find some other means to support their basic-feature rates.

It is important to be clear on the role that CCSCIS and similar models play in proceedings like this one. The Commission stated in its Rate Structure Order that 800 database exogenous costs are to consist of only those costs incurred specifically for implementation of 800 database service.<sup>12</sup> CCSCIS was developed to assist with the identification of specific costs associated with multiple SS7 network elements,<sup>13</sup> each made up of a significant

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<sup>12</sup> Rate Structure Order, 8 FCC Rcd at 911.

<sup>13</sup> The relevant elements include signalling links by type, STPs (local and regional) and SCPs.



number of equipment items, that have multiple investment cost drivers that are shared by many existing services.<sup>14</sup> If, therefore, services such as LIDB and CLASS use equipment also used for 800 database services, the consumption of database query, signaling, global title translation and similar functions for each service -- by type of equipment and vendor if appropriate, times the corresponding unit investment, by function -- must be developed.

To petitioners' knowledge, there is no equally reliable alternative method for some companies that use SS7 equipment and related technologies to identify 800 database costs where shared equipment is employed. For LECs in this position, CCSCIS "allows for the costing of individual CCS network services that share common CCS equipment," as one LEC states.<sup>15</sup> In short, the costs of CCS equipment used for 800 basic service are frequently shared and the costs must be properly assigned.<sup>16</sup> As a practical matter,

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<sup>14</sup> The investment cost drivers include signalling octets, database queries, global title translation and SCP record storage.

<sup>15</sup> See Ameritech Direct Case at 12. Ameritech and NYNEX use STPs and links connecting the local STPs to regional STPs to provide multiple services such as LIDB, CLASS, 800 and POTS. Bell Atlantic uses these facilities to provide 800 and LIDB. Similarly, vintage SCPs have either been replaced by new SCPs or existing SCPs have been installed to enable provisioning of LIDB, CNAM and 800 services (NYNEX, Ameritech). Bell Atlantic's 800 database cost study was forward looking and reflected both shared (800/LIDB) SCPs in the first year, and dedicated (800 only) SCPs for the remainder of the study period.

<sup>16</sup> Companies often purchase SS7 and associated equipment to support both current and future-added services. An assumption that this equipment will always be purchased for a single service would therefore be invalid.

this can be accomplished by some LECs only by complex costing tools such as CCSCIS.

Other LECs are differently positioned and have practical alternatives to the use of CCSCIS for basic 800 database cost development. Several participating BOCs, including Southwestern Bell, Pacific Bell, and BellSouth, have dedicated SCP platforms for 800 database service, as well as shared STPs and associated link costs that have either been recovered in infrastructure or elsewhere, or have developed a sophisticated ancillary record keeping mechanism to differentiate the 800 database exogenous costs from costs related to other services. As a result, it is possible for those latter companies to identify the additional capital costs incurred by 800 basic service through a detailed examination of accounting-based records.<sup>17</sup> In either circumstance, use of a sophisticated cost model may not be essential, nor has it been used for calculating basic 800 database costs by Southwestern Bell, Pacific Bell or BellSouth.

Those distinctions among the LECs are apparently lost on the intervenors who oppose the waiver. The LECs that use SS7 equipment to provide multiple services and that have not recovered the costs, or have not developed ancillary mechanisms to identify the costs, will be unable to identify the exogenous costs of concern to the Commission as accurately without CCSCIS as they can

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<sup>17</sup> For those companies, once these costs have been identified and once the costs for vertical services have been calculated through use of CCSCIS (or similar models), it is a relatively simple matter to develop the costs attributed to 800 database basic service.

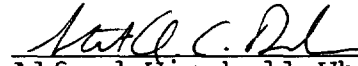
with CCSCIS. Arguably their only alternatives are either to assign the full cost of all newly acquired SS7 equipment to the 800 database service, or to propose some other form of cost assignment. Either of these approaches would probably also be objectionable to the intervenors, who presumably would prefer the use of the models (and the types of access to the models proposed by Bellcore) to an arbitrary allocation of costs based on other records.

### **Conclusion**

The extreme "publish-or-else" approach advocated by the intervenors in response to the Petition for Waiver would violate the Commission's precedents, disadvantage all participating LECs (especially those who relied on CCSCIS to develop rates for both 800 basic and vertical service), and would degrade the quality of information and analysis available to the Commission. The Petition for Waiver therefore should be granted. Bellcore and the participating LECs will work with the staff and with intervenors to ensure

that intervenors have all the access to CCSCIS and its competitively sensitive inputs that they reasonably require.

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CERTIFICATE OF SERVICE

I, Stuart A.C. Drake, do hereby certify that on this 19th day of October, 1993, I have caused copies of the foregoing **REPLY OF THE PARTICIPATING BELL OPERATING COMPANIES IN SUPPORT OF THEIR PETITION FOR WAIVER REGARDING THE COMMON CHANNEL SIGNALLING COST INFORMATION SYSTEM** to be served via first-class United States Mail, postage prepaid, upon the persons on the attached Service List.

  
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